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13 *State of Nevada ex rel. Department of*  
14 *Child and Family Services*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 D.O. JANE DOE, an individual;  
12 K.Y. JANE DOE, an individual;  
13 L.O. JANE DOE, an individual;  
14 L.O.J. JOHN DOE, an individual;  
15 P.K. JANE DOE, an individual,

16 Plaintiffs,

17 vs.

18 STATE OF NEVADA, EX. REL., DEPT OF  
19 HEALTH & HUM. SERVS. DIV. OF CHILD  
20 AND FAMILY SERVS, a public entity of the  
21 State of Nevada; STACEY SILVERSTEIN, an  
22 individual;

23 Defendants.

Case No. 2:23-cv-01929- APG-MDC

24 **STIPULATION AND (PROPOSED)  
25 ORDER TO EXTEND DEADLINE  
FOR DEFENDANTS TO SUBMIT  
THEIR RESPONSE TO THE  
COMPLAINT**

26 Defendants the State of Nevada ex rel. the Department of Child and Family Services “DCFS” and  
27 Plaintiffs P.K. Jane Doe, D.O. Jane Doe, L.O. Jane Doe, L.O.J. John Doe, and K.Y. Jane Doe by and  
28 through their respective counsels, hereby submit this Stipulation and Order Extending Time for  
Defendants to Submit their Response to the Complaint, with a current deadline of January 16, 2024. The  
parties respectfully request that the Court extend said deadline for an additional seven (7) days, up to and  
including January 23, 2024.

This extension gives the Parties the chance to review NRS 432B.325 and discuss a possible  
resolution. This request for an extension is made in good faith and is not for the purposes of delay.

29 . . .

## IT IS SO STIPULATED.

DATED this 16th day of January 2024.

DATED this 16th day of January 2024.

/s/ Cory M. Ford  
ANDRE M. LAGOMARSINO, ESQ. (#6711)  
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/s/ Izaac Rowe  
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*Attorneys for Defendant State of Nevada ex rel. the Department of Child and Family Services*

## ORDER

Future requests for extensions must comply with LR IA 6-1(a) and inform the Court of any prior extensions.

## IT IS SO ORDERED.

DATED this 18th day of January 2024.

Maximiliano D. Couvillier III  
UNITED STATES MAGISTRATE JUDGE

**Izaac Rowe**

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**From:** Cory Ford <Cory@lagomarsinolaw.com>  
**Sent:** Tuesday, January 16, 2024 4:54 PM  
**To:** Izaac Rowe  
**Cc:** Andre Lagomarsino; Denise Valdivia  
**Subject:** RE: 2:23-cv-01929-JCM-VCF - Stipulation for Dismissal

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

You have my permission to affix my electronic signature.

Thanks,

Cory M. Ford, Esq.  
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**From:** Izaac Rowe <IRowe@ag.nv.gov>  
**Sent:** Tuesday, January 16, 2024 4:31 PM  
**To:** Cory Ford <Cory@lagomarsinolaw.com>  
**Cc:** Andre Lagomarsino <aml@lagomarsinolaw.com>; Denise Valdivia <denise@lagomarsinolaw.com>  
**Subject:** RE: 2:23-cv-01929-JCM-VCF - Stipulation for Dismissal  
**Importance:** High

Hello Mr. Ford,

Based on our conversation today:

As I mentioned on the phone, the deadline for a response to your service of the complaint is today, I believe. I have attached a draft of the stipulation for a continuance on the response so you have time to review my request for a dismissal of DCFS. If you are OK, let me know and I can either attach your electronic signature, or you can sign it and scan it back to me.

Here is the language and statutes regarding when DFS has control vs when DCFS has control.

Provision of child protective services in Nevada is a combination of State and County Administered Agencies. Child Protective Services is part of the child welfare service system (NRS 432B.044). Counties in which the "population is 100,000 or more shall provide child welfare services for the children in that county and pay the cost of all those services (NRS 432B.325)." Clark County in Southern Nevada and Washoe County in Northern Nevada are the two counties that meet this standard. DCFS administers the child welfare program for the remaining fifteen (15) rural counties. The agencies that provide protective services are : State of Nevada Division of Child and Family Services (DCFS), Clark County